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October 5, 2006

United States District Court
For the District of Massachusetts
Joseph Moakley U.S. Courthouse
1 Courthouse Way
Boston, MA 02210
ATTN: Clerk's Office

**RE: Stephen Keefe v. Locals 805, 800, 799, International Longshoremen's
Association, AFL-CIO, et al
United States District Court
District of Massachusetts
Docket No.: 04-CV-11340DPW**

Dear Sir or Madam:

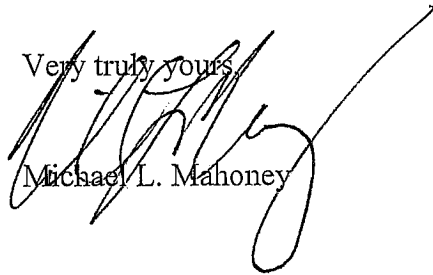
In connection with the above matter, enclosed please find the following documents:

1. Court Ordered Supplementation of the Defendants' Answers to the Plaintiff's Fourth Set of Interrogatories;
2. Minutes from Rules Committee Meeting of August 21, 2006; and
3. Certificate of Service

Kindly file in your usual manner. Should you have any questions, please do not hesitate to contact this office.

Thank you for your attention to this matter.

Very truly yours,


Michael L. Mahoney

Enclosures
MLM

CC: Scott A. Lathrop, Esq.

UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Docket No.: 04-Cv-11340DPW

STEPHEN KEEFE,)
Plaintiff)
)
v.)
)
LOCALS 805,800, & 799,)
INTERNATIONAL)
LONGSHOREMEN'S ASSOCIATION,)
AFL-CIO, et. al,)
Defendants)
_____)

**COURT ORDERED SUPPLEMENTATION OF DEFENDANTS' ANSWERS TO
PLAINTIFF'S FOURTH SET OF INTERROGATORIES**

INTERROGATORY NO. 12

For each of the following persons, please state his "gang" history throughout his membership with the defendant(s), that is, the number of the gang that the person first joined, the date on which the person first joined, the number of the gang that the person next joined, if any, the date on which the person joined the next gang, and so forth, to date:

- A. Brendan Lee
- B. Thomas McGurty

ANSWER NO. 12

Defendants object to this Interrogatory on the grounds that it is overbroad, it is unduly burdensome, it is not properly limited as to time, and it seeks information which is irrelevant to the subject matter of this action, which will be inadmissible at the trial of this action, and which is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding nor waiving this objection, the Defendants state the following:

- A. Brendan Lee:

Mr. Lee has been in the Union since 1989-90. He was non-Guaranteed Annual Income (GAI) working at the craft until 1995. In 1995 GAI was voted away by the port. Mr. Lee was in Gang 12 from 1995 thru 2000. In that time he accrued 1 seniority year. Mr. Lee was part time in Gang 11

prior to a port-wide vote abolishing part time employment outside the union in 2002.

From 2000 thru September 2001, Mr. Lee earned 1 year of seniority in Gang 11.

In October 2002, Mr. Lee earned another year of seniority in Gang 11, and was moved to Gang 10 after 2 years in Gang 11 with at least 650 hours in each year.

From October 2002 thru September 2003, Mr. Lee earned another year of seniority to move up in to the rotating gangs. In October 2003, Mr. Lee was moved into a rotating gang. Mr. Lee was placed in to Gang 8 of the 9 rotating gangs.

Supplementation

Information (regarding Brendan Lee not working exclusively at the Craft) came to light to the during the discovery of this case, when the Plaintiff's attorney provided us with a copy of a document from the Committee for Public Counsel, dated August 2, 2006 which indicated that Mr. Lee had been employed as a Defense Attorney in violation of Hiring Hall Rule 36 (see attached Minutes from Rules Committee Meeting of August 21, 2006). This document was forwarded to our attorney on August 7, 2006. Our attorney sent it to us on August 14, 2006.

A rules committee meeting was held on August 21, 2006. At that meeting, Brendan Lee was suspended for six months for violation of Hiring Hall Rule 36 (found not to be working exclusively at the Craft).

B. Thomas McGurty:

Mr. McGurty was in Gang 12 from 1998 thru 2004. Mr. McGurty retired from job in July 2004, and was placed into Gang 11 in August 2004.

From August 2004 thru October 2004, Mr. McGurty did not accumulate enough hours to move up in gangs.

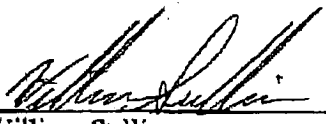
From October 2004 thru September 2005, Mr. McGurty earned 1 year seniority in Gang 11.

As of October 2005, Mr. McGurty has been working on his second year in Gang 11.

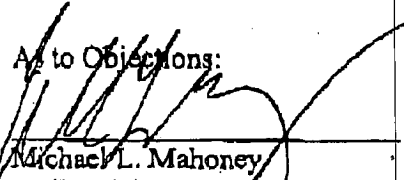
Mr. McGurty also accrued 3 years of seniority while in Gang 12 and working on his other job.

I, William Sullivan, state under the penalty of perjury that: I am the Business Agent for Local 799; I am not the author of the Hiring Hall records, I did not create those records, I merely collected the records from the Hiring Hall and I have read the foregoing Answers to Interrogatories and know the contents thereof; that said answers were prepared with the assistance and advice of counsel, upon whose advice I have relied; that the answers set forth herein, are subject to inadvertent or undiscovered errors, are based on and therefore necessarily limited by the records and information still in existence, presently recollected and thus far discovered in the course of the preparation of these answers; that the Defendants reserve the right to make any changes in the answers if it appears at any time that omissions or errors have been made therein or that more accurate information is available; that subject to the limitations set forth herein the said answers are true to the best of my knowledge, information and belief.

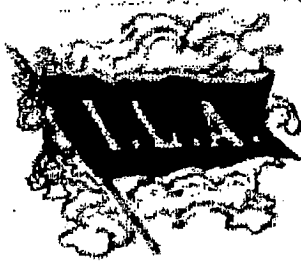
SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY, THIS 5TH DAY OF OCTOBER, 2006.


William Sullivan
Business Agent for
The Defendant, Local 799

As to Objections:


Michael L. Mahoney
Mullen & McGourty
52 Temple Place, 4th Floor
Boston, MA 02111
(617) 338-9200
BBO# 557562

TOTAL P.04



Rules Committee

Locals 799 800 & 805

August 21, 2006

To Business Agents:

At the rules committee meeting held on August 21, 2006, Monday, Brendan Lee of local 800 was suspended for six months from Aug. 21, 2006 through Feb. 21, 2007. He will be allowed to work after all ILA union men have been hired.

Due to violation of rule #36 (found to be not working exclusively at the craft) see attached paper work, and to follow rule #30, 31 and 32 after termination of six months suspension. After suspension Mr. Lee will be placed into gang 12.

Signature of Members

Paul F. McGaffigan

Thomas McGuffey

Joe Swales

Paul C. Lee

Mark Kense

Robert Cunniff

PAUL F. McGAFFIGAN

THOMAS MCGUFFEY

JOSEPH SWALES

RONALD P. LOGAN

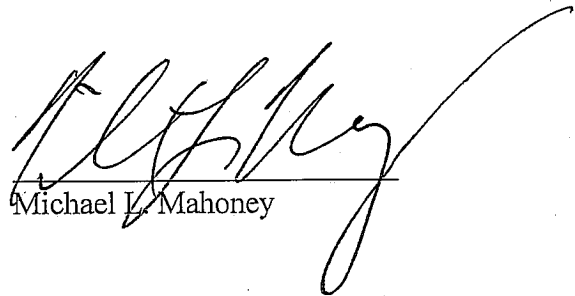
MARK KENSE

ROBERT CUNIFF

CERTIFICATE OF SERVICE

I, Michael L. Mahoney, hereby certify that I have served a true copy of the within document this 3 day of October, 2006, via first class mail, postage prepaid, upon the following:

Scott A. Lathrop, Esq.
Scott A. Lathrop & Associates
122 Old Ayer Road
Groton, MA 01450



Michael L. Mahoney